

EXHIBIT C

IN THE SUPERIOR COURT
OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

RICKY MANUEL, CARLA :
KEES MANUEL :
CATHERINE KELLAM :
JOSEPH GARRISON, and :
ELAINE LANCASTER :
Plaintiffs :

COPY

vs.

Case NO.
02C-10-212 (JRJ)

ELSMERE PARK CLUB :
L.P. and LCL :
MANAGEMENT, L.L.C :
Defendants :

vs.

TOWN OF ELSMERE :
Third-Party :
Defendant :

November 16, 2004

Oral deposition of GERALD C.
LLEWELLYN, Ph.D, taken pursuant to
notice, was held at the law
offices of Klehr, Harrison,
Harvey, Branzburg & Ellers, LLP,
919 Market Street, Suite 1000,
Wilmington, Delaware, commencing
at 9:30 a.m., on the above date,
before Darlene Lowrance, a
Federally Approved Registered
Professional Reporter, Certified
Shorthand Reporter and Notary
Public of the State of Delaware.

ESQUIRE DEPOSITION SERVICES
Suite 760, One Commerce Center
12th & Orange Streets
Wilmington, Delaware 19801

1 THE WITNESS: We don't have
2 that. That's it. You've got the
3 answer.

4 BY MR. SCHLEICHER:

5 Q. Do you remember if you were
6 out there -- I think I asked you this all
7 already.

8 When you looked at the
9 various -- you talked about going to
10 various apartments. You talked about the
11 first floor and third floor.

12 Now, these are three-floor
13 buildings, the first floor being the
14 basement. When you said "first floor,"
15 what did you mean?

16 A. The basement. Well, it
17 depends on the context. Let me clarify
18 it. Ask me your question and I --

19 Q. A few minutes ago you talked
20 about going into the first floor
21 apartments. What did you mean by that?

22 A. That would be the floor
23 above the basement. I think that's their
24 nomenclature that they use. Okay?

1 Q. Approximately how many units
2 did you personally visit above the
3 basement level?

4 A. I would say that I visited
5 more than a dozen. The problem was
6 getting access. People were in there.
7 People were doing things. People
8 wouldn't let you in.

9 Q. Okay.

10 A. I can tell you that, in the
11 basement apartments, that when we got
12 to -- my staff and I got in, essentially,
13 all of those. We got in all of them.

14 One of my jobs as I went
15 through the day -- the days that I was
16 there, I would count the sheets of
17 drywall that were covered.

18 I would count them or
19 estimate if there was a half sheet or a
20 quarter of a sheet. And that's 32 square
21 feet. And, by far, the typical -- if
22 there's a hundred sheets of drywall in an
23 apartment, estimate, could be more or
24 less, we would get -- I would be up to 25